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SCHULTZE AGENCY SERVICES, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-01827-SI (N.D. Cal.)
Case No. 3:11-cv-03856-SI (N.D. Cal.)
MDL No. 1827

This Document Relates To Individual Case No.
3:11-cv-03856-SI (N.D. Cal.)

**STIPULATION OF EXTENSION OF
TIME TO RESPOND TO COMPLAINT,
WAIVER OF SERVICE AND
[PROPOSED] ORDER**

SCHULTZE AGENCY SERVICES, LLC on
behalf of TWEETER OPCO, LLC AND
TWEETER NEWCO, LLC

Plaintiff,

VS.

AU OPTRONICS CORPORATION, et al.,

Defendants.

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 2 WHEREAS, plaintiff Schultze Agency Services, LLC (“Schultze Agency Services”) on
 3 behalf of Tweeter Opco, LLC (“Tweeter Opco”) and Tweeter Newco, LLC (“Tweeter Newco”)
 4 (collectively “Tweeter”) filed a complaint in the above-captioned case against AU Optronics
 5 Corporation, AU Optronics Corporation America, Chi Mei Optoelectronics Corporation, Chi Mei
 6 Optoelectronics USA, Inc., CMO Japan Co., Ltd., Epson Electronics America, Inc., Epson
 7 Imaging Devices Corporation, HannStar Display Corporation, Hitachi Electronic Devices (USA),
 8 Inc., Hitachi, Ltd., Hitachi Displays, Ltd., LG Display Co., Ltd., LG Display America, Inc., Mitsui
 9 & Co. (Taiwan), Ltd., Mitsui & Co. (U.S.A.), Inc., NEC Corporation of America, NEC Display
 10 Solutions of America, Inc., NEC Electronics America, Inc., Samsung Electronics America, Inc.,
 11 Samsung Electronics Co., Inc., Samsung Semiconductor, Inc., Sanyo Consumer Electronics Co.,
 12 Ltd., Sharp Corporation, Sharp Electronics Corporation, Tatung Company of America, Inc.,
 13 Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc.,
 14 Toshiba Corporation, and Toshiba Mobile Display Co., Ltd. (collectively, “Stipulating
 15 Defendants”) on July 1, 2011 (“Complaint”);

16 WHEREAS, Tweeter wishes to avoid the burden and expense of serving process on the
 17 Stipulating Defendants;

18 WHEREAS, the Stipulating Defendants desire a reasonable amount of time to respond to
 19 the Complaint; and

20 WHEREAS, Tweeter and the Stipulating Defendants believe that proceeding on a unified
 21 response date will create efficiency for the Court and the parties.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
 23 undersigned counsel, on behalf of their respective clients, Tweeter, on the one hand, and the
 24 Stipulating Defendants, on the other hand, as follows:

25 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of
 26 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants
 27 of any other substantive or procedural defense, including but not limited to the defenses of lack of
 28 personal or subject matter jurisdiction and improper venue.

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2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise
3 respond to the Complaint will be ninety (90) days from the execution of this stipulation, subject to
4 Federal Rule of Civil Procedure 6(a)(1).

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6 DATED: July 22, 2011

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Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from stipulating defendants.

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3 **IT IS SO ORDERED.**

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5 Dated: 8/19/11, 2011

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7 Susan Illston, United States District Judge

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